

LANE Y. TAKAHASHI 2417-0  
ATTORNEY AT LAW, ALC  
745 FORT STREET, SUITE 2121  
HONOLULU, HAWAII 96813  
TELEPHONE: (808) 521-7181

ATTORNEY FOR DEFENDANT  
FELIPE RAGUINDEN DOMANGUERA

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 09 2004

at 10 o'clock and 35 min. M.  
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA, ) Cr. No. 04-00061-01 DAE  
)  
Plaintiff, )  
)  
vs. ) NOTICE OF MOTION; MOTION  
) TO WITHDRAW AS COUNSEL;  
FELIPE RAGUINDEN DOMANGUERA, ) DECLARATION OF COUNSEL;  
) and  
Defendant. ) CERTIFICATE OF SERVICE  
)  
) Date: April 13, 2004  
) Time: 3:00 p.m.  
) Judge: Kevin S. C. Chang

NOTICE OF MOTION

TO: BEVERLY WEE SAMESHIMA  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850

PLEASE TAKE NOTICE that the foregoing Motion will  
be heard before the Honorable Kevin S. C. Chang in his  
courtroom at the U.S. Courthouse, 300 Ala Moana Boulevard,  
Honolulu, Hawaii on Tuesday, April 13, 2003 at 3:00 p.m.  
or as soon thereafter as counsel may be heard.

Dated: Honolulu, Hawaii, April 8, 2004.


  
LANE Y. TAKAHASHI  
Attorney for Defendant

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 04-00061-01 DAE
	)	
Plaintiff,	)	
	)	
vs.	)	MOTION TO WITHDRAW AS
	)	COUNSEL
FELIPE RAGUIDEN DOMANGUERA,	)	
	)	
Defendant.	)	
_____	)	

MOTION TO WITHDRAW AS COUNSEL

Comes Now, LANE Y. TAKAHASHI, appointed counsel of record for Plaintiff, FELIPE RAGUIDEN DOMANGUERA, and moves this Honorable Court to withdraw as counsel.

This Motion is made pursuant to Rules 110-11 and 335-1 of the Rules of the U.S. District Court for the District of Hawaii, Hawaii Rules of Professional Conduct 1.16(a)(3) and (d)(6), the records and files of this matter, and the attached Declaration of Counsel.

Dated: Honolulu, Hawaii, April 8, 2004.



LANE Y. TAKAHASHI  
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 04-00061-01 DAE
	)	
Plaintiff,	)	
	)	
vs.	)	DECLARATION OF COUNSEL
	)	
FELIPE RAGUINDEN DOMANGUERA,	)	
	)	
Defendant.	)	
_____	)	

DECLARATION OF COUNSEL

I, LANE Y. TAKAHASHI, declare as follows:

1. I am the attorney for FELIPE RAGUINDEN DOMANGUERA, Defendant in the above-entitled case, having been appointed pursuant to the Criminal Justice Act.

2. On April 7, 2003, Defendant discharged me from further representation, citing a loss in confidence in me and irretrievable differences, due in part to my alleged inability to obtain his pretrial release.

3. Pursuant to that oral discharge, the instant motion has been filed.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Dated: Honolulu, Hawaii, April 8, 2004.

  
\_\_\_\_\_  
LANE Y. TAKAHASHI

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that upon the filing of the foregoing Motion, a copy of the same was duly served by hand delivery or U.S. Mail upon:

BEVERLY WEE SAMESHIMA  
Assistant U.S. Attorney  
Room 6100, PJKK Federal Building  
300 Ala Moana Boulevard  
Honolulu, Hawaii 96850

  
Lane Y. Takahashi

LANE Y. TAKAHASHI 2417-  
ATTORNEY AT LAW, ALC  
HAWAII BUILDING  
745 FORT STREET, SUITE 2121  
HONOLULU, HAWAII 96813  
TELEPHONE: (808) 521-7181

ATTORNEY FOR DEFENDANT

04 MAY -6 AM 10:03

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

APR 15 2004

HAWAII HONOLULU at 8 o'clock and 59 min A.M.  
WALTER A. Y. H. CHINN, CLERK

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

UNITED STATES OF AMERICA,	)	Cr. No. 04-00061-01 DAE
	)	
Plaintiff,	)	
	)	
vs.	)	ORDER GRANTING MOTION
	)	TO WITHDRAW AS COUNSEL
FELIPE RAGUINDEN DOMANGUERA,	)	
	)	
Defendant.	)	
	)	

ORDER GRANTING MOTION TO WITHDRAW AS COUNSEL

The Motion to Withdraw as Counsel was heard by Magistrate Kevin S. C. Chang on April 13, 2004 at 2:30 p.m. with Beverly Wee Sameshima, Assistant U. S. Attorney appearing for the United States of America, Lane Y. Takahashi, Attorney for Defendant, and Defendant FELIPE RAGUINDEN DOMANGUERA, having been present, the Court having considered the facts and representations presented, the arguments of Counsel and the records and files herein and good cause appearing therefore;

IT IS HEREBY ORDERED that Lane Y. Takahashi be allowed to withdraw as counsel.

Dated: Honolulu, Hawaii, APR 14 2004.

KEVIN S.C. CHANG  
MAGISTRATE KEVIN S. C. CHANG  
Judge of the Above-Entitled  
Court